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April 21, 2017

VIA ECF AND FACSIMILE

Honorable Paul G. Gardephe
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007-1312

Re: United States v. Kaleil Isaza Tuzman, No. S1 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of our client, Kaleil Isaza Tuzman, to update the Court on the status of privilege issues relating to the production of documents by cooperating witness Stephen Maiden. We continue to review the substantial production of Maiden documents that had been previously withheld by the government and the SEC. We are continuing to consider our options regarding Maiden's assertion of privilege. We respectfully request to update the Court further regarding Maiden's privilege invocations in one month, by May 21, 2017.

We thank the Court in advance for its consideration.

Respectfully,

/s/ Avi Weitzman

cc: All counsel (*via ECF*)